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Attorneys for Defendant GOODLEAP, LLC

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

DAISHA MATTEWS,

Plaintiff,

v.

GOODLEAP, LLC., ET AL.,

Defendant.

Case No. 2:24-cv-01684-WBS-CSK

**STIPULATION & ORDER FOR
MODIFICATION OF SCHEDULING
ORDER**

Pursuant to Local Rule 144(b), Plaintiff Daisha Matthews (“Plaintiff”) and GoodLeap, LLC (“GoodLeap” together with Plaintiff, the “Parties”), by and through their respective undersigned counsel of record, hereby stipulate and seek an order modifying the Scheduling Order (ECF No. 17) as follows:

- Whereas, October 10, 2024, the Court issued a Pretrial Scheduling Order (ECF No. 17), which, among other things, set a September 8, 2025 deadline by which to complete discovery;

2. Whereas, since that date the Parties have diligently pursued discovery, including multiple productions by both parties, multiple rounds of written discovery, and four depositions;
3. Whereas, the Parties have agreed to mediate their dispute with JAMS neutral Bob Meyer, and the first available date that all Parties and Mr. Meyer are available is August 25, 2025;
4. Whereas, the Parties' respective counsel have had multiple successful mediations with Mr. Meyer and believe he is uniquely situated to assist the Parties in hopefully resolving this suit;
5. Whereas, the Parties agree that it would conserve the Parties' resources and likely increase the ability to settle if the Parties can primarily focus efforts on settlement until mediation is completed;
6. Whereas, the Parties would otherwise be engaging in further discovery in preparation for trial under the current schedule;
7. Whereas, the Parties agree that extending the current case deadlines by approximately three months would be sufficient to enable the parties to conserve resources and would promote settlement;
8. Whereas, this is the first extension that the Parties have requested;
9. Whereas, the Parties agree and stipulate to the below schedule and request this Court enter an order approving the same:

Event	Old Date	New Date
Expert witness disclosures due	7/14/2025	10/14/2025
Rebuttal experts due	8/11/2025	11/11/2025
All discovery completed	9/8/2025	12/8/2025
Deadline for filing all motions (except for continuances, temporary restraining orders, or other emergency applications)	10/6/2025	1/16/2026
Final Pretrial Conference	12/15/2025	3/23/2026, 1:30 pm
Trial Start Date	2/10/2026	5/12/2026, 9:00 am

The requested extension is sought in good faith and not for the purposes of delay or any other improper reason.

IT IS SO STIPULATED.

Dated: May 28, 2025

DAISHA MATTHEWS

By: /s/ Adam J. McNeile

Adam J. McNeile

Kristin Kemnitzer

Malachi J. Haswell

Katherine Sass

Peter Holland

Emanwel Turnbull

KEMNITZER, BARRON & KRIEG LLP

Counsel for Plaintiff

Dated: May 28, 2025

ORRICK, HERRINGTON & SUTCLIFFE LLP

By: /s/ Ali M. Abugheida

Ali M. Abugheida

Fredrick S. Levin

Sarah N. Davis


Attorneys for Defendant GoodLeap LLC

ORDER

Pursuant to the foregoing Stipulation, IT IS SO ORDERED:

Event	Old Date	New Date
Expert witness disclosures due	7/14/2025	10/14/2025
Rebuttal experts due	8/11/2025	11/11/2025
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Dated: May 28, 2025


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE